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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1 5 POST OFFICE SQUARE, SUITE 100 BOSTON, MA 02109-3912

May 5, 2010

<u>CERTIFIED MAIL</u>

<u>RETURN RECEIPT REQUESTED</u>

Pamela F. Faggert, Chief Environmental Officer Dominion Energy 500 Dominion Blvd. Glen Allen, Virginia, 23060

Re: Clean Air Act Reporting Requirement for Brayton Point and Salem Harbor Stations,

Docket No. AAA-10-0010

Dear Ms. Faggert:

The United States Environmental Protection Agency ("EPA") is issuing this reporting requirement to Dominion Energy ("Dominion") to determine whether Brayton Point Station in Somerset, MA and Salem Harbor Station in Salem, MA are in compliance with the Clean Air Act ("CAA" or "Act"). In 2000, EPA issued reporting requirements to PG&E Generating Company, LLC ("PG&E") regarding these two facilities. To the extent that Dominion or its predecessor submitted information in response to the earlier EPA reporting requirements that is also responsive to information requested herein, Dominion should so state and indicate the date such information was previously submitted; Dominion is not required to submit information previously provided to EPA in response to the earlier reporting requirements.

EPA is issuing this reporting requirement pursuant to Section 114(a) of the Act, 42 U.S.C. §§ 7414 et seq. Section 114(a) authorizes EPA to require any person who owns and/or operates an emission source to provide information for the purpose of determining whether such person is in violation of any provision of the Act. In order for EPA to determine whether a violation has occurred, Dominion is hereby required to provide responses to the enclosed questions and requests for information. Dominion's response must be certified by a duly authorized officer or agent of Dominion by signing the enclosed Statement of Certification and returning it with the response. All information submitted in response to this reporting requirement must be certified as true, correct, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Dominion.

The information Dominion provides may be used by EPA in administrative, civil, and criminal proceedings. Failure to provide the required information may result in the initiation of a civil action pursuant to Section 113(b) of the Act, 42 U.S.C. §7413(b). In addition, knowingly providing false information in response to this reporting requirement may be actionable under Section 113(c) of the Act, 42 U.S.C. § 7413(c), and 18 U.S.C. §§1001, 1341.

Dominion is entitled to assert a business confidentiality claim, covering all or part of the information that this reporting requirement requires, except that no such claim can be made with respect to emission data as defined at 40 C.F.R. §2.301(a)(2). Any such business confidentiality

claim must be made in accordance with the procedures described at 40 C.F.R. § 2.203(b). EPA will provide the public with information subject to a claim of business confidentiality only in accordance with the procedures set forth in 40 C.F.R. Part 2, subpart B. EPA may provide the public with any information not subject to such a claim without further notice to you.

The required submission of information pursuant to Section 114 of the Act is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

Dominion is required to submit the information requested herein no later than forty-five (45) calendar days after receipt of this letter. Dominion is further required to report any changes or revisions to the information it supplies, within seven (7) days after the change or revision is made. This requirement to provide EPA with changed or revised information shall remain in effect until EPA provides Dominion with written notice of its termination. Please submit your response to this request to:

Susan Studlien, Director
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail code: OES 04-2
Boston, MA 02109-3912

Attn: Elizabeth Kudarauskas

Please also provide an electronic copy of your entire submittal in pdf format on a CD ROM (note: for questions 12, 13, 26, and 27 provide your response in the format of an Excel Spreadsheet or comma delimited format compatible with personal computers running Microsoft Windows software). If you have any questions regarding this reporting requirement, please have your counsel contact Steven Viggiani, Senior Enforcement Attorney, at 617-918-1729.

Sincerely,

Susan Studlien, Director

Suson Studlier

Office of Environmental Stewardship

Enclosures

CAA SECTION 114 REPORTING REQUIREMENT TO DOMINION

INSTRUCTIONS AND DIRECTIONS

INSTRUCTIONS

- 1. Provide a separate narrative response to each question and subpart of a question set forth in the reporting requirement.
- 2. Precede each answer with the number of the question to which it corresponds and at the end of each answer identify the person(s) that provided information that was used or considered in responding to that question, as well as each person that was consulted in the preparation of that response.
- 3. Indicate on each document produced in response to this reporting requirement, or in some other reasonable manner, the number of the question to which it corresponds.
- 4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
- 5. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information are not available or in your possession and identify any source that possesses or is likely to possess such information.

DEFINITIONS

All terms used in this reporting requirement will have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. § 7401 et seq., 40 C.F.R. Part 52 (which incorporates the federally-approved State Implementation Plan, or "SIP"), or other Clean Air Act implementing regulations. Reference is made to the EPA regulatory provisions only; however, you should apply the applicable federally-approved state provisions when appropriate. Definitional clarification is specified below.

- The term "Capital Improvement Project Request" shall mean the documents used by station personnel that serve the purpose of describing projects for equipment and process changes when seeking management approval for a planned expenditure at the station. These documents are also known as capital appropriation requests, authorizations for expenditure, work order records, improvement requisition projects or other similar names.
- The term "Coal-Fired Boiler" or "Coal-Fired Unit" shall mean all equipment used for the purpose of creating steam to generate electricity including, but not limited to, coal handling facilities, boilers, ductwork, stacks, turbines, generators, and all ancillary equipment.

- 3. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any document.
- 4. The term "Emission Unit" means any equipment that emits air pollution, such as boilers, turbines, duct burners, engines, etc.
- 5. The term "Electric Utility Steam Generating Unit" shall have the same meaning as defined at 40 C.F.R. § 60.41Da.
- 6. The term "Steam Generating Unit" shall have the same meaning as defined at 40 C.F.R. § 60.41b.
- 7. The term "PSD/NSR" shall mean the Prevention of Significant Deterioration and the New Source Review preconstruction permitting programs established at CAA subparts C and D and further defined at 40 C.F.R. Parts 51 and 52 and any respective program established under a state implementation plan.
- 8. The term "NSPS" shall mean the Standards of Performance for New Stationary Sources promulgated at 40 C.F.R. Part 60.
- 9. The term "Btu" shall mean the British thermal unit of heat.
- 10. The term "mmBtu" shall mean million British thermal units.
- 11. The term "KWhr" shall mean kilowatt hours of electrical energy
- 12. The term "MWhr" shall mean megawatt hours of electrical energy.

CAA SECTION 114 REPORTING REQUIREMENT TO DOMINION

INFORMATION REQUESTED

- Provide a list of all current and past owners and operators of Brayton Point and Salem Harbor Stations from January 1, 2000 to the present, including the date of ownership and/or operation and percentage ownership for each owner. Also provide a description of Dominion's corporate structure and ownership, including whether Dominion is owned by any other company and, if so, a detailed description of any such ownership.
- 2. List all Steam Generating Units at the Brayton Point and Salem Harbor Stations that have been modified or added since January 1, 2000. For each unit:
 - a. indicate all fuels burned in the last year, such as coal, oil, natural gas, or some other fuel (describe the other fuel);
 - b. indicate what fuels it has burned since January 1, 2000 with the corresponding dates when each unit was converted to another fuel(s);
 - i. if the unit was converted from oil, gas, or some other fuel to coal, please explain the reason for the conversion.
 - ii. if the unit was converted from coal to another fuel please explain the reason for the conversion.
 - c. provide the make and model number;
 - d. indicate the installation date (month and year); and
 - e. provide the original nameplate capacity in mmBtu/hr.
- 3. For each Emission Unit at Brayton Point and Salem Harbor Stations, provide a list of each and every project that cost more than \$100,000, and for which physical construction commenced after January 1, 2000 to the present. Include for each project the following information:
 - a. work order number;
 - b. project summary/description;
 - c. authorized project expenditures;
 - d. actual project expenditures;
 - e. date of approval;

- f. final project completion date; and
- g. date when the unit began operation.
- 4. Provide copies of all capital improvement project requests for all projects that had actual or authorized total expenditures greater than \$250,000, and that involved any of the equipment listed below (a m) for each emission unit at Brayton Point and Salem Harbor Stations from January 1, 2000 to the present:
 - a. boiler casing and boiler floor/wall tube replacements;
 - economizer, reheater(s), primary and secondary superheaters, steam drum and/or primary and secondary air preheater replacements;
 - c. induced draft (ID) fans, forced draft (FD) fans, and fan motor replacements;
 - d. condenser, boiler feed pump, and/or feed water heater replacements;
 - e. flue gas recirculation (FGR) replacements, modifications, or deactivations;
 - f. pulverizer, exhauster, burner, and/or cyclone replacements, upgrades, modifications, or design changes for each unit;
 - g. balanced draft conversion projects;
 - h. turbine rotor/turbine shell replacements or design changes;
 - low-NOx burner (LNB), overfire air, staged combustion, gas or coal reburn, or Selective Catalytic Reduction installation and/or modifications/retrofits including all model or size changes made to the burners for each unit. Also include all changes to the igniters and provide such information as, model, mmBtu/hr, etc.;
 - j. sulfur dioxide control system, including scrubbers, installation, and/or design change projects;
 - k. electrostatic precipitator (ESP) or fabric filter retrofits or design changes;
 - coal handling system changes to increase feed rate or other changes to coal preparation; and
 - m. changes made to equipment to accommodate the burning of fuel, other than coal, (e.g., oil, petroleum coke, and tire-derived fuel), in each boiler.

- 5. For each capital appropriation request related to the projects identified in response to Item 4, above, provide:
 - a copy of the capital improvement project request with authorized expenditure, authorizing signatures, and approval dates;
 - b. total project cost, including all costs incurred by Dominion, and all other costs shared by other owners and operators of the coal-fired boiler or the facility, including:
 - i. date of payment;
 - ii. what items purchased (make, model, and capacity) and per item cost; and
 - iii. whether replacement of older item and, if so, make, model, and capacity of older item.
 - c. work order completion dates (<u>i.e.</u>, when the equipment was returned to service) and all work order project completion reports;
 - d. copies of all emission calculations performed in conjunction with the projects, including calculations performed before the project was commenced and after the project was completed, as well as any determination(s) that no emission calculations were necessary;
 - e. equipment specifications including:
 - i. list of equipment purchased and installed;
 - ii. maximum design capacity of equipment;
 - iii. manufacturer(s) of equipment;
 - iv. contract number(s); and
 - v. labor and equipment costs associated with this equipment,
 - f. project justifications;
 - g. cost/benefit analyses;
 - h. all alternative options analyses;
 - i. all requests for proposals, proposals, and price quotations submitted by equipment suppliers or contractors;

- j. all purchase orders and/or contracts entered into that exceeded \$250,000;
- copies of all correspondence from/with a contractor regarding the material being supplied to support the project that discussed changes in material type or design from the existing component(s) being replaced;
- all engineering analyses, performance tests, or related documents including those showing original as-built performance and performance for the period immediately prior to and immediately following completion of each project;
- m. copies of all documents describing whether the project was associated with a life extension project, capacity increase, efficiency enhancement, or reliability improvement; and
- n. post-project performance tests and/or evaluations conducted to verify equipment guarantees.
- 6. For each project identified in response to Item 4, provide copies of communications that describe the benefits, provide justifications for, or otherwise explain the nature and extent, purpose, cost, and/or frequency of each project. This request includes all communications before and after the project was undertaken, including:
 - a. engineering analyses;
 - b. correspondence;
 - c. memoranda;
 - d. telephone discussion summaries; and
 - e. other communications, including but not limited to:
 - i. Board of Directors reports;
 - ii. meeting minutes; and
 - iii. annual reports.
- 7. For the projects identified in response to Item 4, above, provide the FERC Property Record Accounts 311, 312, 314, and 316. If your accounting practices differ from those outlined by FERC, provide information analogous to the FERC Property Records identified above along with all supporting information.

- 8. Provide copies of all permits, applicability determinations, and non-applicability determinations, along with supporting information, obtained by Dominion related to the projects identified in Item 4. Relevant documents include, but are not limited to:
 - a. permit applications;
 - b. correspondence;
 - c. memoranda;
 - d. telephone discussion summaries; and
 - e. communications between Dominion and the state and/or federal agencies related to findings made under:
 - i. the federal or SIP-approved PSD program;
 - ii. SIP-approved minor source construction permitting program;
 - iii. New Source Performance Standards; and
 - iv. federal and state Non-Attainment NSR.
- 9. Provide a copy of all analyses prepared by Dominion or by anyone else on its behalf showing, for each project identified in response to Item 4 and for which Dominion did not seek a permit or applicability determination, why it was unnecessary for the project to undergo formal state and/or agency review prior to commencing the project.
- 10. For each Emission Unit at Brayton Point and Salem Harbor Stations, provide all engineering analyses, studies, or reports (whether final or draft) containing information regarding the capability of the unit to produce steam or burn fuel, including, but not limited to, those documents containing recommendations for increasing or improving such capability (e.g., feasibility studies), from January 1, 2000 to the present.
- 11. If not already described in response to Item 4, provide copies of all life extension or life optimization studies, evaluations, assessments and reports, including any reports, correspondence, etc., written and implemented from January 1, 2000 to the present, related to extending the life of any boiler or boiler component at each facility, or increasing operating time/availability.
- 12. Provide the following information in electronic format (an Excel Spreadsheet or comma delimited format compatible with personal computers running Microsoft Windows software) for each emission unit at Brayton Point and Salem Harbor Stations from January 1, 2000 to the present:

- a. All Generating Availability Data System (GADS) Performance Reports; and
- b. GADS outage/curtailment reports that provide the following:
 - i. forced outages and curtailment (causes and MWhr lost);
 - scheduled or planned outages and curtailments (causes and MWhr lost);
 and
 - iii. the duration (hours) of all outages and curtailments.
- 13. In addition, if available in electronic format (an Excel Spreadsheet or comma delimited format compatible with personal computers running Microsoft Windows software), provide the following information for each emission unit at Brayton Point and Salem Harbor Stations from January 1, 1980 to December 31, 1999:
 - a. All Generating Availability Data System (GADS) Performance Reports; and
 - b. GADS outage/curtailment reports that provide the following:
 - i. forced outages and curtailment (causes and MWhr lost);
 - scheduled or planned outages and curtailments (causes and MWhr lost);
 and
 - iii. the duration (hours) of all outages and curtailments.
- 14. Provide all documents that estimate fuel usage, growth, and load projections for Brayton Point and Salem Harbor Stations (for the period of January 1, 2000 through 2010). This includes, but is not limited to:
 - a. simulation modeling;
 - b. rate case documentation;
 - c. fuel purchase planning;
 - d. new unit investment planning; and
 - e. other relevant correspondence, reports, and meeting minutes by or among Dominion and the public utility or service commission, Board of Directors, or other state or federal agency.

- 15. Provide the current "five year plan" or other appropriate document(s) that sets forth the capital changes and identifies the projected expenditures that Dominion will be making in the next five years to Brayton Point and Salem Harbor Stations.
- 16. For the period beginning January 1, 2000 to the present, provide all documentation related to efforts to increase the performance and reliability of each Emission Unit at Brayton Point and Salem Harbor Stations on either a short-term or annual basis, including planning, meeting notes, studies, and/or project information, including, but not limited to:
 - a. Board of Directors reports;
 - b. meeting minutes; and
 - c. annual reports.
- 17. Provide dates of selective catalytic reduction ("SCR") and/or selective non-catalytic reduction ("SNCR") retrofits for each Emission Unit in operation.
 - a. Indicate the make, model, and capacity for each SCR or SNCR unit.
 - b. State the reason(s) for each retrofit (e.g., regulatory requirement, permit requirement, voluntary action).
- 18. For each emissions unit in operation with electrostatic precipitator units or baghouses for the control of particulate matter ("PM") emissions, state the reason(s) for the installation of each PM control unit (e.g., regulatory requirement, permit requirement, voluntary action) and provide:
 - a. the type of PM control;
 - b. the date the control unit was installed; and
 - c. the make, model, and capacity.
- 19. For each Emission Unit utilizing SO₂ reduction techniques, provide the following information for the period beginning January 1, 2000 to the present,:
 - a. a summary of monthly SO₂ reductions;
 - i. if the efficiency is measured using inlet and outlet continuous emission monitoring systems, or is estimated through the use of fuel sampling and analysis in conjunction with an outlet SO₂ CEMS, so indicate,
 - ii. if the efficiency is not measured directly using CEMS or CEMS in conjunction with fuel data, substantiate results by submitting all performance tests and any other summaries of parametric measurements that serve as a surrogates,

- b. the maximum peak and sustained SO₂ reductions.
- 20. Provide the installation dates and types (make, model, and capacity) of any air pollution control equipment, other than the equipment identified in your responses to Questions 16, 17, and 18 that has been added to each unit in operation since 2000. State the reason(s) for each addition of control equipment (e.g., regulatory requirement, permit requirement, voluntary action).
- 21. Provide the date(s) of any boiler casing, floor, and wall tube replacement for each steam generating unit in operation since January 1, 2000.
- 22. Provide the original design specifications for each Emission Unit and steam generating unit, including the balanced draft designs at Brayton Point and Salem Harbor Stations. Include all documentation and correspondence, including but not limited to engineering calculations and contract specifications used in setting the design values for:
 - a. steam flow rate, steam temperature and pressure;
 - b. maximum hourly heat input capacity and an explanation of the assumptions made to determine this maximum heat capacity, including but not limited to, each fuel's heat content in Btu/lb and the maximum hourly fuel feed rate in lb/hr;
 - c. gross hourly megawatt (MW) capacity;
 - d. net hourly MW capacity;
 - e. net heat rate in Btu/KWhr; and
 - f. design emission rates, in lb/mmBtu and lbs/hr, for nitrogen oxides ("NOx"), sulfur dioxide ("SO2"), PM, particulate matter of 10 microns or less "PM_{10"}, particulate matter of 2.5 microns or less ("PM2.5"), lead ("Pb"), mercury ("Hg"), ammonia ("NH3"), and hydrogen chloride ("HCl").
- 23. If the original boiler cross-section diagrams that you or your predecessor provided to EPA in response to the previous reporting requirements for Brayton Point and Salem Harbor Stations no longer reflect the boiler design for these units as of the date of receipt of this reporting requirement, describe what changes have been made that are not reflected in the original boiler cross-section diagram and, if available, submit any drawings or other documents that show the changes to the unit.
- 24. From January 1, 2000 to the present, identify on an annual basis the total capital, maintenance, and retirement expenditures made to each electric utility steam generating unit at Brayton Point and Salem Harbor Stations.

- 25. For each Emission Unit at Brayton Point and Salem Harbor Stations from January 1, 2000 to the present, provide the following information in electronic format (Excel or other comma delimited format):
 - a. capacity factor on a monthly and annual basis;
 - b. availability factor on a monthly and annual basis;
 - c. operating hours on a monthly and annual basis;
 - d. fuel consumption on a monthly and annual basis;
 - e. fuel quality (e.g., % sulfur (by weight), % ash, heat content, etc.) on a monthly and annual basis;
 - f. total gross and net generation (MWhr) on a monthly and annual basis;
 - g. heat rate (Btu/KWhr) on a monthly and annual basis;
 - h. identify the top ten annual causes of forced outages as measured by MWhr of lost generation;
 - i. annual planned outage rate by MWhr of lost generation;
 - j. lost generation (in MWhr) on an annual basis due to forced, maintenance, or scheduled outages and curtailments, caused by:
 - i. boiler related components;
 - ii. turbine generator components;
 - iii. pollution control performance;
 - iv. balance of plant; and
 - v. other reasons, and if so, explain what reasons.
 - k. historic scheduled or planned Emission Unit retirement dates from the beginning of operation of each Unit, and any changes to those dates, with an explanation for the reason of the changed date,
 - 1. capacity test documentation and results for each Emissions Unit, including:
 - i. the date and time of the capacity test;

- ii. the standard operating procedure, or equivalent document, for the performance of the capacity tests. This would include the procedures, specifications, conditions, and other parameters under which the representativeness and accuracy of the tests are determined;
- iii. all results of capacity tests including the condition (e.g., valve wide open), steam flow (peak and sustained), maximum heat input capacity (based on the fuel heat content), fuel type, gross megawatt (MW) capacity, and net MW capacity;
- iv. the information in subparagraphs i through iii above, for any other capacity tests not otherwise provided irrespective of whether required by rule or conducted for any other purpose including short tests; and
- v. a description of any equipment limitations or other limiting factors that restricted capacity.
- m. monthly peak hourly electricity generation in MW;
- n. summary results of all complete or partial performance tests, excluding summary result for any SO₂ and NO_x performance tests used to certify or quality assure the acid rain CEMS after 1995, for the following pollutants:
 - i. NOx;
 - ii. SO_{2:}
 - iii. PM, PM₁₀, and PM_{2.5};
 - iv. CO; and
 - v. Air Toxics, including Pb, Hg, HCl, NH₃, and other air toxics that are included in the applicable SIP).
- o. actual monthly and annual emissions (in both lb/mmBtu and tons) of:
 - i. NOx;
 - ii. SO_{2:}
 - iii. CO;
 - iv. PM, PM_{2.5}, PM₁₀; and
 - v. Air Toxics including Pb, Hg, NH₃, HCl, and any other toxics that are included in the applicable SIP).

- vi. Emissions information requested includes annual emissions reports submitted to the applicable state or local regulatory agency and any available quarterly summary data obtained from continuous emission monitoring systems ("CEMS") in flue gas streams.
 - Specify the time frames, associated pollutant emissions, and the location/source of emissions data that has already been reported to the U.S. EPA (e.g., Acid Rain CEMS data/reports, NSPS data/reports, etc.).
 - Acid Rain CEMS data and/or air emission reports previously submitted to EPA for compliance verification of Title IV or applicable NSPS requirements do not need to be resubmitted to satisfy this reporting requirement, although any known or planned changes to that data should be identified.
- vii. Explain how the lb/mmBtu and tons numbers were calculated/determined (e.g., CEMS data, emission factors from AP-42, or stack tests). If emission factors were used, please provide a sample calculation for each pollutant.
- 26. Provide, in an Excel spreadsheet or a comma delimited format compatible with Microsoft Windows software, a copy of each quarterly excess emission report for each Emission Unit at Brayton Point and Salem Harbor Stations from January 1, 2000 to the present. With each quarterly report, include the reason code for the exceedance of each appropriate averaging period for each pollutant reported to the state which Dominion considers exempt and non-exempt, and the basis for any exemption.
- 27. Provide a copy, in an Excel Spreadsheet or comma delimited format compatible with personal computers running Microsoft Windows software, of each quarterly continuous opacity monitoring system (COMS) excess emission report for each emission unit at Brayton Point and Salem Harbor Stations from January 1, 2000 to the present. In accordance with 40 CFR 60.7(c), for each reporting period, specify:
 - a. the magnitude of each excess emission, any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions;
 - b. specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility;
 - c. the nature and cause of any malfunction (if known) and any corrective action taken or preventative measures adopted;

- d. the date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments; and
- e. the unit operating time during the reporting period.
- 28. For the time period January 1, 2000 to the present, please describe in detail any pollution reduction or control measures undertaken, implemented or planned by Dominion at the Brayton Point and Salem Harbor Stations, or in relation to pollutant emissions from Brayton Point and Salem Harbor Stations, pursuant to regulations promulgated by Massachusetts Department of Environmental Protection. Identify in your answer to this question, each of the following:
 - a. the pollutant reduced (e.g., NOx, SO2, PM, Hg, CO2, etc.);
 - b. the amount of each pollutant reduced on an annual basis;
 - all documents relating to any analyses or studies of the environmental benefit(s)
 expected to be achieved by implementation of any pollution reduction or control
 measures;
 - d. all documents relating to any analyses or studies of the feasibility of any pollution reduction or control measures;
 - e. an itemized list of the capital and recurring operation and maintenance costs associated with implementation of any pollution reduction or control measures.
- 29. Provide any and all engineering analyses, studies, reports or other documents related to the consideration of and/or planned installation of pollution controls on any coal-fired or oil-fired electricity generating unit at Brayton Point and Salem Harbor Stations, including but not limited to, projected installation timeframes, capital and O&M cost estimates, cost-effectiveness analyses, expected removal efficiencies, and outlet emission rates.
- 30. Provide the current "projected capital outlay plan" or any other document(s) that sets forth or identifies the operational or equipment changes or the projected capital expenditures that Brayton Point and Salem Harbor Stations will be making in the next five years (or any other planning period used) at either facility. In addition, provide capital planning documents (i.e., five year plans and all other comparable documents) for the period from January 1, 2000, to the present date, inclusive.
- 31. Provide any and all documents from January 1, 2000, to present that discuss the application of current and potential future regulatory requirements, including, but not limited to, Best Available Retrofit Technology, Clean Air Mercury Rule, Clean Air Interstate Rule, State Implementation Plan if applicable, that may apply and how the company plans to comply with such requirements, including but not limited to projected

- emission control installations and dates for each coal-fired and oil-fired electricity generating unit at Brayton Point and Salem Harbor Stations.
- 32. Provide a description of any planned additional generating capacity installations, acquisitions or power purchase agreements projected for Brayton Point and Salem Harbor Stations within the next 10 years, including fuel type, capacity, and projected installation date. Provide copies of all documents discussing or describing such planned generation capacity from January 1, 2000, to present.
- 33. Provide current projected retirement dates for all coal-fired and oil-fired electricity generating units at Brayton Point and Salem Harbor Stations. Provide copies of all documents discussing planned, proposed, or projected retirement dates for all these units from January 1, 2000, to present.

CAA SECTION 114 REPORTING REQUIREMENT TO DOMINION CONFIDENTIAL BUSINESS INFORMATION CLAIMS

CAA SECTION 114 REPORTING REQUIREMENT TO DOMINION STATEMENT OF CERTIFICATION

STATEMENT OF CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.

(Signature)	
(Title)	
(Date)	

Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing Clean Air Act Section 114 Request for Information was mailed by certified mail, return receipt requested, to:

Dominion Energy 500 Dominion Blvd. Glen Allen, Virginia, 23	060	**		
Certified Return Receip	i No			
	Name Title		Date	